

To: Matt Stikes[mwscclimbs@yahoo.com]
Cc: Albright, David[Albright.David@epa.gov]; Engelman, Alexa[ENGELMAN.ALEXA@EPA.GOV]; Gary Brierley[gbrierley@envirotechteam.com]; Adam Rogge[arogge@camsops.com]; Robin, George[Robin.George@epa.gov]; Dermer, Michele[Dermer.Michele@epa.gov]; Rumrill, Nancy[Rumrill.Nancy@epa.gov]
From: Coffman, Joel
Sent: Tue 6/14/2016 4:22:41 PM
Subject: RE: Class II to Class I Permits

Hello Matt:

If you want to look at some links from our website, some of your questions may get answered. From your message, it appears it may be more appropriate for you and your responsible party to come in for a meeting, or, for us to schedule another phone call to discuss. David Albright is out until Monday so far as us having another call or meeting, hopefully, we could schedule it for when he is available.

Below are some web links that may prove beneficial:

<https://www.epa.gov/uic/requirements-all-class-i-wells-and-class-i-hazardous-waste-wells>

<https://www.epa.gov/uic/underground-injection-control-regulations-and-safe-drinking-water-act-provisions>

https://www.epa.gov/sites/production/files/2015-10/documents/page_uic-class1_summary_class1_reqs_508c.pdf

<https://www.epa.gov/sites/production/files/2015-08/documents/aor-zei.pdf>

We also have many of our current Class I UIC permits online that you can look at from this site:

<https://www.epa.gov/uic/underground-injection-control-permits-region-9>

I will look to see about permit application packages I could share with you that may be of help also.

Joel Coffman Groundwater UIC Office

P.G./Physical Scientist 415.972.3530

U.S. EPA Region 9 | 75 Hawthorne Street (WTR-3.2) | San Francisco, CA 94105



United States Environmental Protection Agency

From: Matt Stikes [mailto:mwsclimbs@yahoo.com]

Sent: Monday, June 13, 2016 3:18 PM

To: Coffman, Joel <Coffman.Joel@epa.gov>

Cc: Albright, David <Albright.David@epa.gov>; Engelman, Alexa <ENGELMAN.ALEXA@EPA.GOV>; Gary Brierley <gbrierley@envirotechteam.com>; Adam Rogge <arogge@camsops.com>

Subject: Re: Class II to Class I Permits

Joel,

Thanks again for meeting with us last week. I had some further questions regarding the Badger Creek water disposal well conversion to Class I. Some of the major topics of concern include:

Geologic stability of the location, Badger is near the Kern Front fault separating Kern River from Kern Front field, the fault is active and has surface expression about 1000' east of the well, a recent wireline depth determination was run reaching almost original

effective depth, which shows that no significant movement has occurred at the well in the past 25 years. The location of the fault at the well is interpretative, could entirely miss the well or may cross depending on inclination of the fault plane.

What will the AOR distance be for the application, 1/4 mile or larger? Additionally, will casing diagrams be required for wells within the AOR that do not penetrate the proposed injection zone (Olcese) or the caprock?

Without other nearby wells that penetrate the Olcese zone, would a monitoring plan be required and if so what form would it take?

We are pursuing alternative options to provide disposal

Also, if you could share any example applications that may be of assistance. We have the Alon refinery example in Bakersfield, but a few others would help us with a template.

Thanks for your help in this process,

Matt Stikes, PG

EnviroTech Consultants, Inc.

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From: "Coffman, Joel" <Coffman.Joel@epa.gov>
To: Matt Stikes <mwsclimbs@yahoo.com>
Cc: "Albright, David" <Albright.David@epa.gov>; "Salera, Jerry@DOC" <Jerry.Salera@conservation.ca.gov>; Adam Rogge <arogge@camsops.com>; Joe Selgrath <selgrath@envirotechteam.com>; Gary Brierley <gbrierley@envirotechteam.com>; "Engelman, Alexa" <ENGELMAN.ALEXA@EPA.GOV>; "Moffatt, Brett" <Moffatt.Brett@epa.gov>
Sent: Friday, June 3, 2016 11:24 AM
Subject: Class II to Class I Permits

Here is the information for the Conference call on June 8th from 10 – 11 AM.. This is for discussion of wells currently permitted as Class II that have been determined to need EPA UIC Class I Permits.

Specifically for this call, we are discussing the WCAC operated wells that include Chalk

Cliff, Badger Creek, McKittrick and Live Oak.

Dial-In Number: (866) 299-3188

Conference Code: **9723733**

Thanks,

Joel Coffman [Groundwater UIC Office](#)

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From: Matt Stikes [<mailto:mwsclimbs@yahoo.com>]

Sent: Thursday, June 02, 2016 2:56 PM

To: Coffman, Joel <Coffman.Joel@epa.gov>

Cc: Albright, David <Albright.David@epa.gov>; Engelman, Alexa <ENGELMAN.ALEXA@EPA.GOV>; Moffatt, Brett <Moffatt.Brett@epa.gov>; Dermer, Michele <Dermer.Michele@epa.gov>; Salera, Jerry@DOC <Jerry.Salera@conservation.ca.gov>; Adam Rogge <arogge@camsops.com>; Joe Selgrath <selgrath@envirotechteam.com>; Gary Brierley <gbrierley@envirotechteam.com>

Subject: Re: Live Oak Class I

Joel,

Thank you for the response regarding WCAC power plant water disposal wells. Unfortunately, I can only speak on behalf of the WCAC operated wells which include Chalk Cliff, Badger Creek, McKittrick, and Live Oak (rows 2-5). Our understanding was that only Badger Creek and Live Oak were required to switch to Class I as they have

stopped supplying steam to their associated oil field. Chalk Cliff and McKittrick plants are still delivering steam as was their initial design.

WCAC would be glad to participate in a possible EPA meeting with other operators in the same situation. I'd recommend Jerry Salera with DOGGR who could provide a thorough list of other cogen operators with Class II wells.

As far as a possible conference call we are available on June 8-9 to discuss details of Badger Creek and Live Oak. As far as a group meeting is concerned, sometime after June 20th would work for us.

Thanks for your help and consideration.

Best regards,

Matt Stikes, PG

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